

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS, LLC d/b/a  
BRAZOS LICENSING AND  
DEVELOPMENT,**

*Plaintiff,*

**v.**

**ZTE CORPORATION**

*Defendant.*

**CIVIL ACTION NO. 6:20-cv-00487-ADA-DTG  
CIVIL ACTION NO. 6:20-cv-00488-ADA-DTG  
CIVIL ACTION NO. 6:20-cv-00489-ADA-DTG  
CIVIL ACTION NO. 6:20-cv-00491-ADA-DTG  
CIVIL ACTION NO. 6:20-cv-00497-ADA-DTG**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY ALL DEADLINES**

On March 27, 2023, Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) and Defendant ZTE Corporation (“Defendant”) (collectively, “Parties”) filed a Joint Notice of Settlement and Motion to Stay All Deadlines. D.I. 377.<sup>1</sup> On March 29, 2023, the Court granted the Parties’ motion and stayed the above-captioned actions until May 5, 2023. D.I. 380. On May 5, 2023, the Parties filed a Joint Motion to Stay All Deadlines (D.I. 383), and on May 9, 2023, the Court granted the Parties’ motion and stayed all deadlines through June 5, 2023 (May 9, 2023 Text Order).

A settlement in principle has been reached to resolve all matters in controversy asserted by Brazos’s First Amended Complaint (D.I. 38). The Parties have reached agreement on all but two terms in the settlement agreement. Accordingly, the Parties request a further stay of all deadlines

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<sup>1</sup> Unless otherwise noted, all “D.I. \_\_\_\_” citations refer to Case No. 6:20-cv-00487-ADA-DTG.

to allow for negotiations regarding the two remaining terms to be finalized, and the Parties to submit a motion to dismiss all claims and counterclaims at issue.

The Parties expect to file dismissal papers within twenty-five (25) days.

In light of this settlement and impending dismissal, the Parties respectfully request the Court stay all impending deadlines until June 30, 2023.

Dated: June 5, 2023

RESPECTFULLY SUBMITTED,

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BRAZOS LICENSING AND  
DEVELOPMENT**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this 5th day of June, 2023, via the Court's CM/ECF system.

/s/ Jonathan K. Waldrop  
Jonathan K. Waldrop